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6 Attorneys for Defendant
SALVADOR ORTIZ-PADILLA
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 SALVADOR ORTIZ-PADILLA,

15 Defendant.
16

Case No. 1:21-cr-00239-JLT-SKO

STIPULATION TO CONTINUE CHANGE OF
PLEA HEARING; ORDER

17 IT IS HEREBY STIPULATED, by and between the parties through their respective
18 counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Salvador Ortiz-Padilla, that the change of plea
20 hearing currently scheduled for April 1, 2024, may be continued to April 29, 2024, at 9:00 a.m.

21 The parties have been in active plea negotiations regarding a resolution in this case, and
22 the government has extended a plea agreement in this matter. Counsel for Mr. Ortiz-Padilla has
23 discussed this plea agreement with Mr. Ortiz-Padilla. However, following these discussions, Mr.
24 Ortiz-Padilla required the assistance of an immigration attorney to more fully understand the
25 impact of any plea in this case. Mr. Ortiz-Padilla contacted and began meeting with an
26 immigration attorney in February 2024. Mr. Ortiz-Padilla is in the midst of discussing his
27 questions with his immigration attorney. At the moment, he is waiting to hear back from his
28 immigration attorney regarding several issues that they have discussed. Accordingly, he requires

1 additional time and opportunity to meet with this attorney and to work with this attorney on
2 issues related to his immigration status.

3 The requested continuance is made with the intention of conserving time and resources
4 for both the parties and the Court. The government is in agreement with this request and the
5 requested date is a mutually agreeable date for both parties. The parties stipulate that for the
6 purpose of computing time under the Speedy Trial Act, the Court should exclude time from the
7 date of this order through April 29, 2024, for defense preparation and investigation, pursuant to
8 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice served by
9 resetting the change of plea hearing outweigh the best interest of the public and the defendant in
10 a speedy trial.

11
12 Respectfully submitted,

13 HEATHER E. WILLIAMS
14 Federal Defender

15 Date: March 26, 2024

/s/ Reed Grantham
16 REED GRANTHAM
Assistant Federal Defender
17 Attorney for Defendant
SALVADOR ORTIZ-PADILLA

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19 PHILLIP A. TALBERT
20 United States Attorney

21 Date: March 26, 2024

/s/ Justin Gilio
22 JUSTIN GILIO
Assistant United States Attorney
23 Attorney for Plaintiff
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ORDER

IT IS SO ORDERED. The change of plea hearing currently set for April 1, 2024, is hereby continued to April 29, 2024, at 9:00 a.m.

The time through April 29, 2024, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: **March 26, 2024**


UNITED STATES DISTRICT JUDGE